

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

---

**THIS DOCUMENT RELATES TO:**

KATHLEEN CRIMMINS,

Plaintiff,

v.

JOHNSON & JOHNSON, and  
JOHNSON & JOHNSON CONSUMER,  
INC. f/k/a JOHNSON & JOHNSON  
CONSUMER COMPANIES, INC.,

Defendants.

---

MDL No. 3:16-md-02738-MAS-  
RLS

Honorable Michael A. Shipp

Case No. 3:18-cv-15697 -MAS-  
RLS

**RESPONSE TO AUGUST 15,  
2024 ORDER TO SHOW  
CAUSE (DKT. 33096)**

Mark P. Robinson, Jr. of Robinson Calcagnie, Inc., and Jennifer Lenze of Lenze Lawyers, PLC., counsel of record for Plaintiff Annie Louise Moore, submit the following Response to the Court's August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On November 5, 2018, a Short Form Complaint was directly filed on behalf of Plaintiff Annie Louise Moore in MDL No. 2738. Pursuant to the September 1, 2023 Amended Plaintiff's Profile Form ("PPF") Order, a Plaintiff Profile Form, core records, and signed medical records authorization were required to be served upon Defendants via MDL Centrality by a certain date. Counsel for Plaintiff made several attempts to contact Plaintiff Kathleen Crimmins to obtain the necessary information and documentation to comply with the Court's September 1, 2023 Amended PPF Order. Despite multiple letters, phone calls, text messages, and emails, Plaintiff Kathleen Crimmins has not responded to Counsel's communication attempts.

Based on Plaintiff's lack of communication with counsel, Jennifer Lenze of Lenze Lawyers, PLC. and all attorneys of record for Plaintiff filed a Motion to Withdraw as Counsel for Plaintiff on June 17, 2024 (Dkt. 9). The Court set the motion for July 15, 2024 and stated that the motion would be decided on the papers and no appearance would be required. As of this date, the Court has not issued a decision on the Motion to Withdraw as Counsel for Plaintiff. Because the Court has begun issuing decisions on earlier filed Motions to Withdraw in other matters setting deadlines for the plaintiff to either have its new counsel make an appearance or inform the Court that the plaintiff is proceeding *pro se*, Mark P. Robinson, Jr. of Robinson Calcagnie, Inc., Jenniferr Lenze of Lenze Lawyers, PLC. and all attorneys of record for Plaintiff respectfully request that the Court not dismiss the case with prejudice until after the Motion to Withdraw decision is issued.

Dated: August 30, 2024

ROBINSON CALCAGNIE, INC.

By: /s/ Mark P. Robinson, Jr.

Mark P. Robinson, Jr.  
19 Corporate Plaza Drive  
Newport Beach, CA 92660  
(949) 720-1288  
mrobinson@robinsonfirm.com

***Counsel for Plaintiff***

LENZE LAWYERS, PLC.

By: /s/ Jennifer Lenze

Jennifer Lenze  
999 Corporate Drive, Suite 100  
Ladera Ranch, California 92694  
(310) 322-8800  
jlenze@lenzelawyers.com

***Counsel for Plaintiff***